



HONORABLE ROBERT J BRYAN

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

TANYA C HAYNES,

Plaintiff,

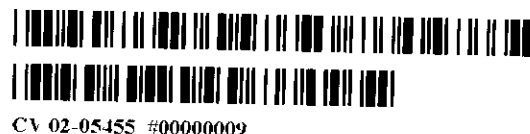
vs

MUNOZ REGIMBAL AND ASSOCIATES,
doing business as INTERNAL MEDICINE
NORTHWEST, and DOES 1-3, inclusive,

Defendants

NO. C02-5455 RJB

JOINT STATUS REPORT



Defendants, by and through their attorney of record, Donald L. Anderson of The Law Offices of EISENHOWER & CARLSON, PLLC, and plaintiff, by and through her attorney of record, Artis C. Grant, Jr. of the Law Office of GRANT & GRANT, submit the following joint status report and discovery plan

1 Statement of Nature and Complexity of Case This is a pregnancy discrimination and sex discrimination case arising out of the employment relationship of plaintiff Tanya Haynes and Munoz Regimbal and Associates. Plaintiff alleges the

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The Law Offices of GRANT & GRANT
The Law Dome
3002 So. 47th Street
Tacoma, Washington 98409
Telephone (253) 472-6213

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defendants had some role in the pregnancy and sex discrimination Plaintiff has alleged claims of Pregnancy Discrimination in violation of Title VII of the Civil Rights Act of 1964, 42 U S C §2000e *et seq* Plaintiff also has alleged claims of Sex Discrimination in violation of Washington Constitution, Art 31 § 1,2, RCW 49 60, and WAC 162-30-020 Defendants have denied plaintiff's claims and asserted affirmative defenses This case is a non-complex civil action

2 Results of FRCP 26(f) Conference Counsel for the parties conferred on November 15, 2002, and agreed to the Joint Discovery Plan contained in this report

3 Deadline for Joining Additional Parties The parties propose a deadline for joining additional parties of December 15, 2002

4 Statement of ADR Method The parties have agreed that alternative dispute resolution through the use of a private mediator may be helpful in resolving plaintiff's claims

5 Deadline for Conducting ADR The parties have set a date of April 30, 2003, as the deadline for mediation to be completed under Local Rule 39 1 Due to the complexity of the case this deadline may have to be extended

6 Proposed Discovery Plan

A The parties held their FRCP 26(f) conference on November 15, 2002 Defendants and Plaintiff will produce their FRCP 26(a) initial disclosures by December 2, 2002

B Discovery will be needed into the facts of the case, plaintiff's alleged economic and emotional distress damages, and the affirmative defenses raised by the defendants The parties agree that discovery should be conducted pursuant to the Federal Rules of Civil Procedure and Local Rules in the Western District of Washington The plaintiff believes more than 10 depositions will be required for Plaintiff's case and believes no deposition will require more than one seven hour day The Defendants

1 believe that not more than one day will be sufficient for any deponent other than the
2 plaintiff

3 C The parties are in agreement that discovery should be managed to
4 minimize expense, but for the present have agreed to utilize the Federal Rules of Civil
5 Procedure for the exchange of discovery documents

6 D The parties will attempt to prioritize discovery so that meaningful
7 mediation may occur prior to the completion of the discovery that would otherwise be
8 required if the case were to proceed to trial

9 E The parties will submit to the Court, at a later date, a stipulated protective
10 order for confidential documents, if any, and medical records

11 7 Deadline for Conclusion of Discovery April 30, 2003

12 8 Use of Magistrate The parties do *not* agree that a full-time magistrate
13 may conduct all proceedings, including trial and entry of judgment under 28 U S C §
14 636(c) and Local Rule MJR 13

15 9 Bifurcation The parties agree that this case should not be bifurcated

16 10 Pretrial Trial Matters Trial statements and a pre-trial order, pursuant to
17 Local Rule 16 should be required

18 11 Shortening or Simplifying Case The parties do not have at present any
19 suggestions for shortening or simplifying the case

20 12 Trial Date The case will be ready for trial on September 15, 2003

21 13 Jury Trial will be by jury

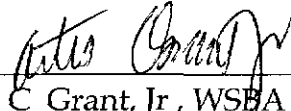
22 14 Length of Trial This trial should not last more than four court days

23 15 Unavailability of Counsel for Trial At present, counsel for the parties do
24 not foresee any complications in setting a September 15, 2003, trial date

25 16 Status Conference The parties have agreed that a status conference is not
26 necessary in this case

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2 DATED this 25th day of November, 2002.

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4 THE LAW OFFICE OF GRANT & GRANT

5 By 
6 Artis C. Grant, Jr, WSBA No 26204
7 Attorney for Plaintiff

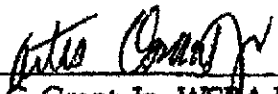
8 DATED this ____ day of November, 2002

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10 EISENHOWER & CARLSON, PLLC

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12 By _____
13 Donald L. Anderson, WSBA No 8373
14 Attorneys for Defendants
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2 DATED this 25th day of November, 2002.

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4 THE LAW OFFICE OF GRANT & GRANT

5 By 
6 Artis C. Grant, Jr., WSBA No. 26204
7 Attorney for Plaintiff

8 DATED this 26 day of November, 2002.

9
10 EISENHOWER & CARLSON, PLLC

11 By 
12 Donald L. Anderson, WSBA No. 8373
13 Attorneys for Defendants
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